Mr. Carol M. Thomas
Secretary
The Federal Trade Commission
Sixth Street & Pennsylvania
Avenue, N.W.
Washington, D.C. 20580

Dear Mr. Thomas:

Enclosed are comments in response to the Commission's

Notice of January 18, 1979 (44 Federal Register 3777), which

are submitted on behalf of the following six companies:

American Brands, Inc., Brown & Williamson Tobacco Corporation,

Liggett & Myers Tobacco Company, Inc., Lorillard, Philip

Morris Incorporated, and R. J. Reynolds Tobacco Company.

Very truly yours,

Allan Topol Counsel

Enclosure

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